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**Revised EW sediment dioxin data report**

Susan McGroddy to: Ravi Sanga

10/07/2011 03:27 PM

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To: Ravi Sanga/R10/USEPA/US@EPA

Cc: "Dan Berlin (dberlin@anchorqea.com)" <dberlin@anchorqea.com>, "Debra Williston  
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History: This message has been forwarded.

2 attachments



EW final Sediment D-F Data Report\_5-27-11.docx Response to comments on sediment dioxin report.docx

Ravi,

We have revised the sediment dioxin data report and I have attached the revised data report and a response to comments. Please let me know if you have any questions or concerns. I would like to finalize this as soon as possible so we can produce the last batch of final data reports.

Thanks.  
Susie

USEPA SF



1387451

Subject: Re: EW Dioxin data report - EPA Comments

Susie and Doug -- EPA has reviewed the Draft Data Report: Results of Dioxin and Furan Analyses of Archived Surface and Subsurface sediment samples and have the following comments below. Please resubmit the data report with a response to EPAs comments.

Let me know if you have any questions.

Ravi

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1) Page 2, Section 2: Please change the first bullet to read: "To characterize the nature and extent of dioxin in the subsurface".

**Response:** Comment addressed

2) Pages 2-3, Table 2-1: The table includes numerous discrepancies where the "Date" column does not agree with information provided in the EWG Memo, "Proposed dioxin samples", dated 12/2/2010. Please review all sampling dates and resolve any discrepancies.

**Response:** Comment addressed. The dates have been reviewed and the dates in the data report are correct. The memo had erroneous dates.

3) Page 2, Table 2-1: The sampling rationale text for subsurface core intervals does not correspond with EPAs notes on the same. Specifically, indications of native material and the lack of SMS exceedences needs to be clarified or this language removed from the report. Please add if the determination of SMS exceedences relates to

the specific depth interval represented by the core or if this is meant to refer to the depth intervals immediately above/below that selected for dioxin analysis. On sample SC-04, EPA believes that there were SMS exceedences in the 1-2ft and 2-4ft intervals. Please check if this is the case and add this information to the report. Also, please check the basis for statements regarding the presence of native material. For example, EPA believes that the native demarcation within the depth interval for sample SC-04 was not strong. It's also not clear to EPA why this has been summarized as "predominantly native material". Please add clarifying text or remove this language from the document.

**Response:** Comment addressed

4) Page 7, Section 4 (Results of Chemical Analysis): Please provide a full explanation for the derivation of TEQs. Which TEFs were used and were calculations made for non-detected congeners using one-half the non-detected concentration? Also remove the typo "(FOOTNOTE TEF VALUES)"

**Response:** Comment addressed

5) Dioxin/Furan TEQ data Figure: Although the footnote explaining the composition of source tracing sample MH-comp 3 is helpful, it is nevertheless misleading to color code the B-24 area to be the same as the results of the MH-comp 3 sample. It still appears that the B-24 area has one of the highest dioxin TEQs (41.9 pptr) of all the source tracing basin samples. And it begs the question of why there is so little sediment data being collected in Area 11. Please remove the pink coloration from the B-24 upland area and remove the arrow pointing from the MH-comp 3 box to the B-24 area.

**Response:** This figure is not part of the data report but it will be revised.

6) Figures: Please indicate the outfall located in the SE corner of Slip 27. If this outfall does not exist or a reason exists for not including this outfall on the figure, please provide this explanation to EPA.

**Response:** There is no outfall in the SE corner of Slip 27.

7) The 'Core Visuals' diagram (transmitted 11/3) did not report the CSL exceedance for HPAHs at the 6-7 ft interval of SC09. This exceedance is reported in Map 4-5 of the Subsurface Sediment Data Report. Please verify that the 'Core Visuals' diagram accurately reflects analysis results and ensure that a corrected version of the core visuals exists in the final Subsurface Data Report.

**Response:** The core visuals have been updated and will be correct in the final subsurface data report.

8) Figures: Please verify the existence of an outfall near SC-18 and add to the figures.

**Response:** The outfall is on the maps.

9) Please correct the page numbering discontinuity associated with each figure.

**Response:** The discontinuity is intentional to account for the blank page on the back of the maps when they are inserted.